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4 Attorneys for Defendant  
5 Rainbow K Jewelry SAS

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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
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11 Susan Oster d/b/a/ Feral Jewelry, an  
individual,

12 Plaintiff,

13 v.

14 Rainbow K Jewelry SAS, a French  
15 joint-stock company; mytheresa.com  
GmbH, a German entity; Schoola, Inc.  
16 d/b/a/ Olivela.com, a Delaware  
corporation; SoPicks, an Italian entity;  
17 Eastward Bound Technology, Inc.  
d/b/a/ Vugstyle, Inc., a Colorado  
18 corporation; Last Resort, LLC, a  
California company; and DOES 1-50,  
19 inclusive,

20 Defendants.  
21

Case No. 2:25-cv-04929 JLS (PDx)

**DEFENDANT RAINBOW K  
JEWELRY SAS' REQUEST FOR  
JUDICIAL NOTICE**

*Filed concurrently with Motion to Stay  
Action and Memorandum of Points  
and Authorities; (Proposed) Order*

**Date: February 20, 2026**

**Time: 10:30 a.m.**

**Ctrm: 8A**

Judge: Hon. Josephine L. Staton

22 Defendant Rainbow K Jewelry SAS ("Rainbow" or "Defendant") respectfully  
23 requests that the Court take judicial notice of Exhibits A-E from Plaintiff Oster's  
24 first filed infringement action pending before the Paris Court of Justice, 3rd  
25 Chamber, 2nd Section, Case No. RG 25/05477, Portalis No. 352J-W-B7J-C7WDE  
26 ("French Action") attached to this Request. Judicial notice is proper of facts that  
27 "can be accurately and readily determined from sources whose accuracy cannot  
28 reasonably be questioned." Fed. R. Evid. 201(b)(2). Thus, courts have taken judicial

1 notice of the existence of documents filed in French and United States courts. *MGA*  
2 *Entm't Inc. v. Deutsche Bank AG*, Civ. No. CV 11-4932-GW(RZx), 2013 U.S. Dist.  
3 LEXIS 198282, \*9-10 (C.D. Ca. November 7, 2013).

4 Here, Rainbow asks the Court to take judicial notice of documents that were  
5 publicly filed in the French Action by Oster or Rainbow or are Orders issued by the  
6 French Court ("French Action Documents"). Because these French Action  
7 Documents are publicly filed and no party can reasonably dispute their authenticity,  
8 the Documents are subject to judicial notice, and the Court may consider them in  
9 evaluating Defendant Rainbow's Motion to Stay filed concurrently herewith.

10 Defendant Rainbow, therefore, respectfully request that the Court take  
11 judicial notice of the following French Action Documents:<sup>1</sup>

12 1. Attached as Exhibit A is a true and correct copy of the French language  
13 Counterfeit Summons filed by Oster before the Court of First Instance of Paris, Paris  
14 Court of Justice, 3rd Chamber, 2nd Section, Case No. RG 25/05477, Portalis No.  
15 352J-W-B7J-C7WDE<sup>2</sup> ("French Action") dated April 23, 2025.

16 2. Attached as Exhibit B is a true and correct copy of the French language  
17 Pre-trial Writ filed by Oster in the French Action dated July 23, 2025.

18 3. Attached as Exhibit C is a true and correct copy of the French language  
19 Order issued by the French Court in the French Action dated September 18, 2025.

20 4. Attached as Exhibit D is a true and correct copy of the French language  
21 Pre-trial (incidental) Writs in defense filed by Rainbow in the French Action dated  
22 October 8, 2025.

23  
24 <sup>1</sup> Each Exhibit is accompanied by an uncertified translation provided by Rainbow's  
25 French counsel's office. While Oster already possess these French Action  
26 Documents as a party thereto, Rainbow will provide the Court and Plaintiff with  
certified translations if requested.

27 <sup>2</sup> Tribunal Judiciaire de Paris, 3ème Chambre, 2ème Section, n° RG 25/05477, n°  
28 Portalis 352J-W-B7J-C7WDE.

1           5.       Attached as Exhibit E is a true and correct copy of the French language  
2 Order issued by the French Court in the French Action dated November 14, 2025.

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4 Dated: December 9, 2025

BURKE, WILLIAMS & SORESENSEN, LLP

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6 By: s/ Edith Sanchez Shea

7 Edith Sanchez Shea

8 Attorneys for Defendant

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